



BOULT CUMMINGS
CONNERS BERRY PLC

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EXECUTIVE SECRETARY

August 21, 2001

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: Docket to Establish Generic Performance Measurements,
Benchmarks and Enforcement Mechanisms for BellSouth
Telecommunications, Inc.
Docket No. 01-00193

Dear David:

Please find enclosed the original and thirteen copies of the Comments of the CLECs inserted into the matrix as requested by the Tennessee Regulatory Authority in the above-captioned proceeding. The references to Kinard testimony and attachments refer to the modifications that need to be made or objections to BellSouth Telecommunications, Inc.'s ("BellSouth") efforts to change the metrics. Since BellSouth has modified its business rules from those ITC DeltaCom accepted, any comment on a BellSouth originated metric focuses on the SQM business rules referred to in Mr. Coon's footnote no. 2 on his matrix. Because of the short time to complete the chart and the complexity of all references to modifications in the testimony, we request a chance to make a supplemental filing in addition to what is provided today.

Copies have been provided to parties.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker

HW/nl

Company

Date

Matrix I

SOM Measures from the TRA Order of August 11, 2000, and later modified by the June 26, 2001 order in Docket 99-00430			Agree or Disagree with Baseline Measure ¹	If disagree, Proposed alternative.
Pre-Ordering OSS				
1. Average Response Time and Response Interval	Agree		See KK-A p.1	
2. Interface Availability Regional Level 99.5% for any unscheduled downtime. No	Agree		See KK-A p.1	
Ordering				
3. Percent Flow-Through Service Requests (Summary)	Disagree		See KK-A p.2	
4. Percent Flow-Through Service Requests (Detail)	Disagree			
5. Flow-Through Error Analysis	Informational			
CLEC LSR Information - LSR Flow-Through Matrix				
6. Percent Rejected Service Requests	Agree		See KK-A p.3	
7. Reject Interval Distribution and Average Reject Interval	Agree		See KK-A p.3	
8. Reject Interval	Agree			
9. Percent Firm Order Confirmation Returned	Agree		See KK-A p.5	
10. Speed of Answer in Ordering Center	Agree		See KK-A p.5	
11. Average Response Time for Loop Make-Up Information	Agree			
Provisioning				
12. Mean Held Order Interval & Distribution Intervals	Agree		See KK-A p.5	
13. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	Agree		See KK-A p.5	
14. Percent Missed Installation Appointments	Agree		See KK-A p.6	
15. Average Completion Interval (OCI) & Order Completion Interval Distribution	Disagree		See KK-A p.6,	
16. Average Completion Notice Interval	Agree		See KK-A p.7	
17. Coordinated Customer Conversions	Disagree		See KK-A p.8	
18. % Provisioning Troubles w/ 30 days Service Order Activity	Agree		See KK-A p.8	
19. Total Service Order Cycle Time (TSOCT)	Diagnostic			
20. Percentage of LNP Only Due Dates within Industry Guidelines	Agree		See Kinard rebuttal pg. 7.	

Kinard Direct.

21. Percentage of Time the Old Service provider Releases the Subscription Prior to the Expiration of the Second 9 Hour Timer	Agree	See Kinard rebuttal pg. 7
22. Percentage of Customer Accounts Restructured Prior to LNP Due Date	Agree	See Kinard rebuttal pg. 8.
23. Percentage of Pre-mature Disconnects for LNP Orders	Agree	See Kinard rebuttal pg. 8
24. Average Days Required to Process a Request	Agree	See Kinard rebuttal pg. 9
25. Percentage of Pre-mature Disconnects (Coordinated Cutovers)	Agree	See Kinard rebuttal pg. 8.
26. Percentage of Missed Mechanized INP Conversions	Agree	See Kinard rebuttal pg. 9
27. Percent NXX's loaded and tested prior to the LERG effective date	Agree	See KK-B p. 4
28. Average Delay Days for NXX Loading and Testing	Agree	See Kinard rebuttal pg. 10.
Maintenance & Repair		
29. Missed Repair Appointments	Agree	See KK-B p. 8
30. Customer Trouble Report Rate	Agree	See KK-B pp. 8-9
31. Maintenance Average Duration	Agree	See KK-B p. 9
32. Percent Repeat Troubles w/i 30 days)	Agree	See KK-B p. 9
33. Out of Service > 24 Hours	Agree	
34. OSS Interface Availability	Agree	
35. OSS Response Interval and Percentages	Agree	See KK-B p. 1
36. Average Answer Time - Repair Centers	Agree	See KK-B p. 9
37. Mean Time to Repair	Agree	See Kinard rebuttal pg. 14.
Billing		
38. Invoice Accuracy	Agree	See KK-A p. 9
39. Mean Time to Deliver Invoices	Agree	See KK-A p. 9
40. Usage Data Delivery Accuracy	Agree	See KK-A p. 10
41. Usage Data Delivery Completeness	Agree	
42. Usage Data Delivery Timeliness	Agree	
43. Mean Time to Deliver Usage	Agree	See KK-10
44. Percent of Accurate and Complete Formatted Mechanized Bills	Agree	See Kinard rebuttal pg. 6..
45. Billing Completeness	Agree	Can also live with BST's two metrics.
46. Unbillable Usage	Disagree	Can delete.
Operator Services (Toll) and Directory Assistance		
47. Average Speed to Answer (Toll)	Agree	

48. Percent Answered within "X" Seconds (Toll)	Agree	
49. Average Speed to Answer (DA)	Agree	
50. Percent Answered within "X" Seconds (DA)	Agree	
51. Percentage of Updates Completed into the DA Database within 72 hours for Facility Based CLECs	Agree	
52. Average Update Interval for DA Database for Facility Based CLECs	Agree	
53. Percentage DA Database Accuracy for Manual Updates E911	Agree	See Kinard rebuttal pg. 9.
54. Timeliness	Agree	
55. Accuracy	Agree	
56. Mean Interval	Agree	
Trunk Group Performance		
57. Trunk Group Service Report	Agree	See KK-B p. 10
58. Trunk Group Service Detail	Agree	See KK-B p. 10
Collocation		
59. Average Response Time	Agree	See KK-B p. 10-11
60. Average Arrangement Time	Agree	See KK-B p. 11
61. % of Due Dates Missed	Agree	See KK-B p. 11
Bona Fide Requests		
62. Percentage of Requests Processed within 30 Business Days	Agree	Can accept quarterly for now.
63. Percentage of Quotes Provided for Authorized BFRs / Special Requests Processed within X (10, 30, 90) Business Days	Agree	Can accept quarterly for now.
Attach additional proposed measures on a separate sheet.		

/1 Baseline measures for this proceeding are those adopted by the Authority in Docket 99-00430, the BellSouth/ TTC Delacom Arbitration.

See Kinard rebuttal pg. 11.

See Kinard rebuttal pg. 11.

CLEC Coalition
August 21, 2001

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed a
Pre-Ordering OSS			
1. Average Response Time and Response Interval	Elapsed time is measured in seconds and tenths of seconds rounded to the nearest tenth of a second. Standard: TN Reservations 1-30: 2 seconds and none greater than 5 seconds. TN Reservations 31+: Less than 2 hours. Address validation, due date, LIDB: 2 seconds. CSR: 5 seconds. Dispatch: 8 seconds. PIC and Directory Listings: Parity.	Agree	Also will accept parity P
2. Interface Availability Regional Level	Benchmark: 99.5% for any unscheduled downtime. No scheduled downtime during prime time operating hours (7am - 6pm Eastern).	Agree	Change no scheduled ma to 7 a.m. to 10 p.m. Wo pulling CSRs, working r sales time for CLECs.
Ordering			
3. Percent Flow-Through Service Requests (Summary)	Resale Residence - 95%; Resale Business - 90%; UNE - 85%; LNP - 85%.	Agree for total not designed to flow through, which should be 95%.	

4. Percent Flow-Through Service Requests (Detail)	Resale Residence - 95%; Resale Business - 90%; UNE - 85%; LNP - 85%.	Agree for total not designed to flow through, which should be 95%.	
5. Flow-Through Error Analysis	Diagnostic.	OK	
CLEC LSR Information - LSR Flow-Through Matrix			
6. Percent Rejected Service Requests	Diagnostic.	OK	
7. Reject Interval Distribution and Average Reject Interval	Texas Measurement	Agree	
8. Reject Interval	95% or greater within: (mechanized) 1 hour; (partially mechanized) 5 hours; (non-mechanized) 24 hours.	Agree	
9. Percent Firm Order Confirmation Returned	All Res and Bus 95% within 5 hours/ Complex Bus 94% within 24 hours for 200 or less lines and 48 hours for 200 or more lines/ UNE Loop (1-49) 95% within 5 hours/ UNE Loop (>50) 94% within 48 hours/ Switch Ports 95% within 5 hours. The Average for the remainder of each measure disaggregated shall not exceed 20% of the established benchmark.	Agree	But TX now has 2 hours hours for partially mech.
10. Speed of Answer in Ordering Center	Greater than 95% of calls, by center, are answered within 20 seconds. 100% of all calls answered within 30 seconds.	Agree	
11. Average Response Time for Loop Make-Up Information	Manual: 3 business days; Electronic (Actual Requested, actual received) 12.6 seconds and 90% - 15 seconds; 95% - 25 seconds. (Design requested, design received) 10 seconds and 90% - 11.9 seconds; 95% - 20 seconds.	Agree	
Provisioning			
12. Mean Held Order Interval & Distribution Intervals	See Appendix 1.	See KK-D retail analog.	
13. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	95% >= 48 hours.	Agree	
14. Percent Missed Installation Appointments	See Appendix 1.	See KK-D retail analog.	

15. Average Completion Interval (OCI) & Order Completion Interval Distribution	95% within 'x' days unless otherwise noted - See Appendix 2.	??? Appendix 2 is blank.	See KK-D
16. Average Completion Notice Interval	See Appendix 1.	See KK-D retail analog.	
17. Coordinated Customer Conversions	95% <= 15 minutes	Disagree	
18. % Provisioning Troubles w/ 30 days Service Order Activity	See Appendix 1.	See KK-D retail analog.	
19. Total Service Order Cycle Time (TSOCT)	Diagnostic.	OK	
20. Percentage of LNP Only Due Dates within Industry Guidelines		96.5% Agree	
21. Percentage of Time the Old Service provider Releases the Subscription Prior to the Expiration of the Second 9 Hour Timer		96.5% Agree	
22. Percentage of Customer Accounts Restructured Prior to LNP Due Date		96.5% Agree	
23. Percentage of Pre-mature Disconnects for LNP Orders	2% or less premature disconnects starting 10 minutes before scheduled due time.	Agree more than 10 minutes	
24. Average Days Required to Process a Request	90% within 35 days.	Disagree	
25. Percentage of Pre-mature Disconnects (Coordinated Cutovers)	Texas Measurement	Agree	Can live with properly c (See KK-C p. 5)
26. Percentage of Missed Mechanized INP Conversions	2% or less premature disconnects starting 10 minutes before scheduled time, 8% or less of the BST coordinated conversions beyond 30 minutes, 2% beyond 1 hour from scheduled time or 1% beyond 2 hours.	Disagree	But agree if measurement conversions.
27. Percent NXX's loaded and tested prior to the LERG effective date	100% by LERG effective date.	Agree	
28. Average Delay Days for NXX Loading and Testing	100% within 5 calendar days of completion date.	Agree	
Maintenance & Repair			
29. Missed Repair Appointments	Standard: 1% missed.	Agree	
30. Customer Trouble Report Rate	See Appendix 3.	See KK-D retail analog.	

31. Maintenance Average Duration	See Appendix 3.	See KK-D retail analog.	
32. Percent Repeat Troubles w/ 30 days	See Appendix 3.	See KK-D retail analog.	
33. Out of Service > 24 Hours	(1) Out of service conditions where a dispatch is required: 90% resolved within 4 hours, 95% resolved within 8 hours, 99% resolved within 16 hours. (2) Out of service conditions where no dispatch is required: 85% resolved within 2 hours, 95% resolved within 3 hours. 99% resolved within 4 hours. (3) All other troubles resolved within 24 hours.	Agree	
34. OSS Interface Availability	99.50%	Agree	
35. OSS Response Interval and Percentages	Parity with retail (TAFI, CRIS, DLETH, DLR, LMOS, LMOSupd, LNP, MARCH, OSPCM, Predictor, SOCs).	Agree	See KK-D
36. Average Answer Time - Repair Centers	Greater than 95% of calls, by center, are answered within 20 seconds. 100% of all calls answered within 30 seconds.	Agree	
37. Mean Time to Repair	Parity with retail.	See KK-F.	
Billing			
38. Invoice Accuracy	Parity with retail.	See KK-F.	
39. Mean Time to Deliver Invoices	Parity with retail.	See KK-F.	
40. Usage Data Delivery Accuracy	Parity with retail.	See KK-F.	
41. Usage Data Delivery Completeness	Parity with retail.	See KK-F.	
42. Usage Data Delivery Timeliness	Parity with retail.	See KK-F.	
43. Mean Time to Deliver Usage	Parity with retail.	See KK-F.	
44. Percent of Accurate and Complete Formatted Mechanized Bills	99%	Agree	
45. Billing Completeness	Parity with retail.	See KK-F.	
46. Unbillable Usage	Aggregate measurement. No Benchmark required.	OK or delete.	
Operator Services (Toll) and Directory Assistance			
47. Average Speed to Answer (Toll)	Parity by design.	KPMG to check	See KK-A p. 10
48. Percent Answered within "X" Seconds (Toll)	Parity by design.	KPMG to check	See KK-A p. 10
49. Average Speed to Answer (DA)	85% answered within 10 seconds. 95% answered within 20 seconds.	Agree	

50. Percent Answered within "X" Seconds (DA)	85% answered within 10 seconds. 95% answered within 20 seconds.	Agree	
51. Percentage of Updates Completed into the DA Database within 72 hours for Facility Based CLECs	95% updated within 72 hours.	Agree	
52. Average Update Interval for DA Database for Facility Based CLECs	48 hours. Benchmark will be reevaluated in 6 months.	Agree	
53. Percentage DA Database Accuracy for Manual Updates	97%	Agree	
E911			
54. Timeliness	Parity by design.	Subject to KPMG check.	
55. Accuracy	Parity by design.	Subject to KPMG check.	
56. Mean Interval	Parity by design.	Subject to KPMG check.	
Trunk Group Performance			
57. Trunk Group Service Report	BST to CLEC trunk blockage at parity with BST to BST trunk blockage.	Agree	If disaggregated per KK
58. Trunk Group Service Detail	BST to CLEC trunk blockage at parity with BST to BST trunk blockage.	Agree	If disaggregated per KK
Collocation			
59. Average Response Time	95% within 10 calendar days.	Agree	
60. Average Arrangement Time	Standard: (1) 90 calendar days Caged Physical Collocation, (2) 20 days Cageless Collocation, and (3) 30 calendar days Virtual Collocation.	Agree	
61. % of Due Dates Missed	Zero misses of committed due date.	Agree	
Bona Fide Requests			
62. Percentage of Requests Processed within 30 Business Days	90% within 30 business days.	Disagree	
63. Percentage of Quotes Provided for Authorized BFRs / Special Requests Processed within X (10, 30, 90) Business Days	90% within 30 business days. New network elements that are operational at the time of request - 10 days. New network elements that are Ordered by the FCC - 30 days. New network elements not operational at the time of the request - 90 days.	Disagree	

MATRIX III

Enforcement Mechanisms adopted in the TRA Order of February 23, 2001 in Docket 99-00430 ¹²	Agree or Disagree with Baseline Enforcement Mechanism	If disagree, proposed alternative
Tier 1 - Ordering	Agree	
Tier 1 - Provisioning	Agree	
Tier 1 - UNE Provisioning	Agree	
Tier 1 - Maintenance and Repair	Agree	
Tier 1 - UNE Maintenance and Repair	Agree	
Tier 1 - LNP	Agree	
Tier 1 - IC Trunks	Agree	
Tier 1 - Collocation	Agree	
Tier 2 - OSS Pre-Ordering	Agree	
Tier 2 - Ordering	Agree	
Tier 2 - Provisioning	Agree	
Tier 2 - UNE Provisioning	Agree	
Tier 2 Maintenance and Repair	Agree	
Tier 2 - UNE Maintenance and Repair	Agree	
Tier 2 - Billing	Agree	
Tier 2 - LNP	Agree	
Tier 2 - IC Trunks	Agree	
Tier 2 - Collocation	Agree	

The CLECs' understanding is that the remedy amounts specified in Appendix 4 pertain to a measure-based enforcement mechanism and that the remedy amounts would be incurred for a submeasure failure in a designated measure category. Therefore, the "agree" designation reflects support for the dollar amount in Appendix 4.

Although there is support for the dollar amounts to remedy submeasure violations in a specific category, there are the following concerns:

- Billing measures should apply to both Tier 1 and Tier 2.
- The product disaggregation specified in Exhibit KK-E, which expands upon the disaggregation in Appendix 3 and Appendix 1, should be used. Exhibit KK-E specifies disaggregation by measure.
- Measure categories should also include Change Management, Bona Fide/Special Request Process and Trunk Group Performance.
- Parity-by-Design should be verified if Data Base Update, OS/DA and E-911 measure categories are excluded.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via facsimile or hand delivery, to the following on this the 21st day of August, 2001.

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